

ANTHONY J. DE LAURENTIS, DEFENDANT

PRO SE

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**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

IN RE NEW JERSEY TAX SALES)	:
CERTIFICATES ANTITRUST LITIG.)	
)	Master Docket No.
)	3:12-CV-01893-MAS-TJB
)	
)	CLASS ACTION
)	JURY TRIAL DEMANDED

ANSWER

DEFENDANT'S ANSWER TO PLAINTIFFS' CONSOLIDATED MASTER

CLASS ACTION COMPLAINT

Defendant, **ANTHONY J. DE LAURENTIS**, answers the Amended Complaint
as follows:

1. I, Defendant Anthony J. De Laurentis, have never attended any tax sale auction in the State of New Jersey; nor have I ever purchased any New Jersey tax sale certificates, either for myself or for any other party. I DENY any allegations in this paragraph that state or otherwise imply that I have participated in a conspiracy in

connection with any tax sale auction in the State of New Jersey.

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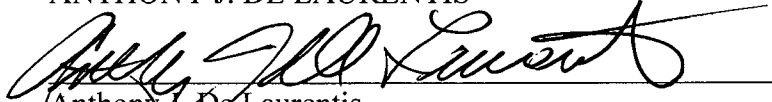
AFFIRMATIVE DEFENSES

- A. I, Defendant Anthony J. De Laurentis, have never attended a tax sale in the State of New Jersey;
- B. I have never purchased any New Jersey tax sale certificates. In fact, I have never seen a New Jersey tax sale certificate;
- C. I have never seen or discussed in any manner whatsoever any list or lists of properties that were sold or to be sold at a New Jersey tax sale;
- D. I have never discussed or assisted in any manner whatsoever any person or company with the purchase of any New Jersey tax sale certificates;

- E. I have never contracted, combined, conspired or in any other way committed any act in connection with any tax sale in New Jersey that could be adjudged to have been a *per se* violation of Section 1 of the Sherman Act, 15 U.S.C. §1;
- F. I have never contracted, combined, conspired or in any other way committed any act in connection with any tax sale in New Jersey that could be adjudged to have been a violation of New Jersey Antitrust Act, N.J.S.A. §56:9-3;
- G. I have never had association with the other Defendants named in this case with respect to any acts taking place in or in any way relating to New Jersey so as to constitute an association-in-fact “enterprise” as that term is defined in 18 U.S.C. §1964(4), that engages in, and the activities of which affect, interstate commerce;
- H. I have taken no action that damaged Plaintiff or the Class or any action or alleged action that in any relates to any New Jersey tax sale auction.

WHEREFORE, I, Defendant Anthony J. De Laurentis, pray that the Court awards me judgment against Plaintiff and the Class, dismisses me from this action, awards me the costs of defending this action, and awards me such other relief as the Court deems just and proper.

ANTHONY J. DE LAURENTIS



Anthony J. De Laurentis

2100 Jolie Place

Crofton, MD 21114

(240) 447-5269

E-mail: tonypat@comcast.net